

**FILED**  
9/27/2021 JMK

THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	No. 21 CR 564
	)	<b><u>Violations:</u></b> Title 18,
v.	)	United States Code,
	)	Sections 1014, 1028(a)(4),
KATRINA PIERCE	)	1028A(a)(1), and 1343

**COUNT ONE**  
**(Wire Fraud)**

**JUDGE KENDALL**  
**MAGISTRATE JUDGE VALDEZ**

The SPECIAL NOVEMBER 2020 GRAND JURY charges:

1. At times relevant to Counts One through Seven of this indictment:
  - a. Defendant KATRINA PIERCE was a resident of Chicago, Illinois.
  - b. The Coronavirus Aid, Relief, and Economic Security (CARES) Act was a federal law enacted to provide emergency relief to American workers and small businesses suffering from the economic effects of the Coronavirus pandemic.
  - c. Pursuant to the CARES Act, the U.S. Department of the Treasury provided Economic Impact Payments (so-called "stimulus" payments) to American households. The first stimulus payments were issued in amounts up to \$1,200 per adult earning less than \$99,000, and \$500 per child under the age of 17. These initial stimulus payments were automatic for eligible taxpayers who filed a 2019 federal income tax return.
  - d. Low- to moderate-income families qualifying for Earned Income Tax Credits and Additional Child Tax Credits could reduce the amount of taxes they owed, while increasing the amounts of their tax refunds, based in part on the number of children in their families.

e. A representative of a deceased taxpayer could claim a refund due to that deceased taxpayer, for federal income taxes overpaid by or on behalf of the decedent, by filing a form with the Internal Revenue Service (IRS Form 1310), verifying under penalty of perjury that the claim was true, correct, and complete.

f. The Cook County Clerk's Office was the official keeper of vital records, including records of births and deaths occurring in Chicago.

g. A relative of a deceased person could request a death certificate from the Clerk's Office by mailing a written application certifying that the requestor is a relative of the decedent and is entitled to the record pursuant to Illinois law; by providing a copy of an identification card; and by paying a processing fee. Alternatively, a requestor could submit an application electronically through a computer system at a neighborhood currency exchange.

2. Beginning in or about 2019 and continuing until on or about September 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, devised, intended to devise, and participated in a scheme to defraud and to obtain money from the U.S. Treasury by means of materially false and fraudulent pretenses, representations, and promises, as described below.

3. It was part of the scheme that PIERCE requested and obtained death certificates from certain government bureaus of vital statistics, including those of Cook County and Springfield, Illinois, and the States of California, Michigan,

Minnesota, Missouri, and North Carolina, so that she could obtain personal identity information of deceased persons and then use that identity information to defraud the federal government. PIERCE fraudulently obtained death certificates in part by falsely claiming to be a relative of deceased victims.

4. It was further part of the scheme that PIERCE knowingly filed false and fraudulent income tax returns with the IRS, and caused false and fraudulent income tax returns to be filed with the IRS, electronically and by mail. PIERCE filed such tax returns under her own name, under the name of an alias ("Rajona Pierce"), and under the names of other persons, including deceased persons, whose personal identity information had been fraudulently obtained by her. PIERCE did so with the intent of fraudulently obtaining tax refunds and stimulus payments from the Treasury.

5. It was further part of the scheme that the federal income tax returns filed and caused to be filed by PIERCE contained materially false information regarding the purported taxpayers' personal information, business information, and income, among other things. For example, in an income tax return that PIERCE filed in her own name, she falsely claimed to be a "Head of Household," with a deceased boy listed as a dependent child, so that she could fraudulently claim certain tax credits and a larger tax refund to which she was not otherwise entitled.

6. It was further part of the scheme that PIERCE attempted to support the false representations in those income tax returns by attaching, and causing to be attached, certain false schedules and forms, falsely reporting and claiming, among

other things, additional income and adjustments to income (Schedule 1); additional taxes (Schedule 2); income and expenses from business (Schedule C); earned income credit (Schedule EIC); self-employment tax (Schedule SE); additional child tax credit (Schedule 8812); and an IRS Form 1310 (Statement of Person Claiming Refund Due a Deceased Taxpayer).

7. It was further part of the scheme that PIERCE attached fabricated birth certificates to income tax returns, and caused fabricated birth certificates to be attached to income tax returns, falsely claiming deceased children as dependents.

8. It was further part of the scheme that the false and fraudulent income tax returns filed and caused to be filed by PIERCE listed accounts that she controlled for purposes of receiving deposits of tax refunds or stimulus payments to which she was not entitled.

9. It was further part of the scheme that PIERCE concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence of the scheme, the purposes of the scheme, and the acts committed in furtherance of the scheme.

10. On or about April 4, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and



fraudulent U.S. Individual Income Tax Return (IRS Form 1040), for tax year 2019, in the name of an alias, "Rajona Pierce," which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT TWO**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about April 29, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040), for tax year 2019, in her own name, which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT THREE**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about May 26, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040) for tax year 2019, in the name of a deceased person (Victim 1), which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT FOUR**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about June 16, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040) for tax year 2019, in the name of a deceased person (Victim 2), which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.



**COUNT FIVE**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about February 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040), for tax year 2020, in her own name, which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT SIX**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about February 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040), for tax year 2020, in the name of an alias, "Rajona Pierce," which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT SEVEN**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about February 20, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent U.S. Individual Income Tax Return (IRS Form 1040) for tax year 2020, in the name of a deceased person (Victim 1), which income tax return was transmitted to the IRS electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT EIGHT**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about April 29, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, specifically, the name and social security number of Victim 3, during and in relation to a felony violation, namely, the wire fraud offense described in Count Two;

In violation of Title 18, United States Code, Section 1028A(a)(1).



**COUNT NINE**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about May 26, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, specifically, the name and social security number of Victim 1, during and in relation to a felony violation, namely, the wire fraud offense described in Count Three;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TEN**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about June 16, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, specifically, the name and social security number of Victim 2, during and in relation to a felony violation, namely, the wire fraud offense described in Count Four;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT ELEVEN**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about February 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, specifically, the name and social security number of Victim 3, during and in relation to a felony violation, namely, the wire fraud offense described in Count Five;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**COUNT TWELVE**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about February 20, 2021, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, specifically, the name and social security number of Victim 1, during and in relation to a felony violation, namely, the wire fraud offense described in Count Seven;

In violation of Title 18, United States Code, Section 1028A(a)(1).



**COUNT THIRTEEN**  
**(Possession of Identification Documents)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count One are incorporated here.
2. On or about September 14, 2021, at Chicago, in the Northern District of Illinois, Eastern Division,

KATRINA PIERCE,

defendant herein, knowingly possessed identification documents, namely, more than 35 death certificates issued by the States of California, Illinois, Michigan, Minnesota, Missouri, and North Carolina, with the intent that such documents be used to defraud the United States;

In violation of Title 18, United States Code, Section 1028(a)(4).

**COUNT FOURTEEN**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. At times relevant to Counts Fourteen through Sixteen of this indictment:

a. The COVID-19 Economic Injury Disaster Loan (EIDL) program was a financial assistance program for small businesses suffering from a temporary loss of revenue because of the Coronavirus pandemic. Pursuant to this EIDL program, eligible small business owners could obtain low-interest, long-term loans in amounts up to \$150,000, and advances on such loans in amounts up to \$10,000.

b. The EIDL program was administered by the U.S. Small Business Administration (SBA). SBA was authorized to provide EIDL loans and advances to enable small business owners to satisfy financial obligations and operating expenses that they otherwise could have satisfied if the pandemic had not occurred. Small business owners could use the proceeds of EIDL loans and advances for working capital and normal business operating expenses, such as employee payroll, health care benefits, and rent.

c. Applications for EIDL loans and advances could be transmitted to SBA electronically, using a portal on SBA's internet website.

d. Defendant KATRINA PIERCE was not an EIDL-eligible small business owner.

2. During August 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, devised, intended to devise, and participated in a scheme to defraud and to obtain money from the U.S. Treasury by means of materially false and fraudulent pretenses, representations, and promises, as described below.

3. It was part of the scheme that PIERCE submitted EIDL applications to SBA, and caused EIDL applications to be submitted to SBA, in which she falsely claimed to be a small business owner with employees.

4. It was further part of the scheme that PIERCE submitted false and fraudulent EIDL applications to SBA, and caused false and fraudulent EIDL applications to be submitted to SBA, under the names of other persons, including farmers and small business owners in Illinois and other states, whose personal identity information was unlawfully taken and used without their knowledge and consent.

5. It was further part of the scheme that PIERCE knowingly made materially false statements in EIDL applications, and caused materially false statements to be made in EIDL applications, concerning the existence and nature of the purported small businesses on whose behalf she sought EIDL loans and loan advances. For example, in separate EIDL applications, PIERCE falsely claimed that she was the owner of a manufacturing business with 106 employees and a retail electronics business with 14 employees, both businesses purportedly located at the same address (an apartment where PIERCE was then residing), when in fact, PIERCE did not own or operate any such businesses.

6. It was further part of the scheme that PIERCE intentionally listed false telephone numbers and email addresses in her false and fraudulent EIDL applications to prevent SBA from contacting the purported small business owners/loan applicants and then uncovering the fraud scheme.

7. It was further part of the scheme that the false and fraudulent EIDL applications that PIERCE knowingly submitted to SBA, and caused to be submitted to SBA, listed bank accounts that she controlled for purposes of receiving deposits of EIDL loan proceeds.

8. It was further part of the scheme that PIERCE transmitted false and fraudulent EIDL applications to SBA electronically, and caused false and fraudulent EIDL applications to be transmitted to SBA electronically, via SBA's online portal.

9. It was further part of the scheme that PIERCE concealed, misrepresented, and hid, and caused to be concealed, misrepresented, and hidden, the existence of the scheme, the purposes of the scheme, and the acts committed in furtherance of the scheme.

10. On or about August 17, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent EIDL application in which she (PIERCE) falsely claimed to be the owner



of a retail electronics business with 14 employees, which false and fraudulent EIDL application was transmitted to SBA electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT FIFTEEN**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count Fourteen are incorporated here.
2. On or about August 24, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent EIDL application in which she (PIERCE) falsely claimed to be the owner of a manufacturing business with 106 employees, which false and fraudulent EIDL application was transmitted to SBA electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT SIXTEEN**  
**(Wire Fraud)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count Fourteen are incorporated here.
2. On or about August 28, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, for the purpose of executing the scheme described above, knowingly transmitted and caused to be transmitted by means of wire communication in interstate commerce, certain writings, signs, and signals, namely, a false and fraudulent EIDL application under the name of the owner of an agriculture business in Ramsey, Illinois (Victim 4), a person whose identity information was taken and used without his knowledge and consent, which false and fraudulent EIDL application was transmitted to SBA electronically via an interstate network;

In violation of Title 18, United States Code, Section 1343.

**COUNT SEVENTEEN**  
**(False Statements)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraph 1 of Count Fourteen is incorporated here.
2. On or about August 17, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly made false statements to SBA, and caused false statements to be made to SBA, for the purpose of influencing the action of SBA upon an EIDL application. More specifically, in an EIDL application transmitted electronically to SBA, PIERCE falsely stated, among other things, that:

- a. she was the owner of a retail electronics business;
- b. the business was established on March 19, 2008;
- c. the business had 14 employees as of January 31, 2020;
- d. for the 12-month period prior to January 31, 2020, the business had \$178,000 in gross revenues;
- e. the cost of goods sold for the 12-month period prior to January 31, 2020, was \$85,000;
- f. the business lost \$62,000 in rents because of the disaster; and
- g. the non-profit or agricultural enterprise cost of operation for the 12-month period prior to January 31, 2020, was \$47,000;

when in fact, as PIERCE then knew, this alleged business did not exist;

In violation of Title 18, United States Code, Section 1014.

**COUNT EIGHTEEN**  
**(False Statements)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraph 1 of Count Fourteen is incorporated here.
2. On or about August 24, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly made false statements to SBA, and caused false statements to be made to SBA, for the purpose of influencing the action of SBA upon an EIDL application. More specifically, in an EIDL application transmitted electronically to SBA, PIERCE falsely stated, among other things, that:

- a. she was the owner of a manufacturing business;
- b. the business was established on September 8, 2010;
- c. the business had 106 employees as of January 31, 2020;
- d. for the 12-month period prior to January 31, 2020, the business had \$670,000 in gross revenues; and
- e. the cost of goods sold for the 12-month period prior to January 31, 2020, was \$280,000;

when in fact, as PIERCE then knew, this alleged business did not exist;

In violation of Title 18, United States Code, Section 1014.

**COUNT NINETEEN**  
**(False Statements)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraph 1 of Count Fourteen is incorporated here.
2. On or about August 28, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly made false statements to SBA, and caused false statements to be made to SBA, for the purpose of influencing the action of SBA upon an EIDL application. More specifically, in an EIDL application transmitted electronically to SBA, PIERCE falsely stated, among other things, that:

- a. “KATRINA PIERCE” was the trade name for an agriculture business in Ramsey, Illinois;
- b. mh[xxxxxxxxxx]@mail.com was the email address for that agriculture business and its owner; and
- c. the business held a certain bank account (ending in 8204) at a certain bank;

when in fact, as PIERCE then knew, her name was not the trade name for that business, she had no legitimate relationship with or connection to that business, the listed email address was false, and the listed bank account was her account;

In violation of Title 18, United States Code, Section 1014.



**COUNT TWENTY**  
**(Aggravated Identity Theft)**

The SPECIAL NOVEMBER 2020 GRAND JURY further charges:

1. Paragraphs 1 through 9 of Count Fourteen are incorporated here.
2. On or about August 28, 2020, at Chicago, in the Northern District of Illinois, Eastern Division, and elsewhere,

KATRINA PIERCE,

defendant herein, knowingly transferred, possessed, and used, and caused to be transferred, possessed, and used, without lawful authority, a means of identification of another person, namely, the name and social security number of Victim 4, during and in relation to a felony violation, namely, the wire fraud offense described in Count Sixteen;

In violation of Title 18, United States Code, Section 1028A(a)(1).

**FORFEITURE ALLEGATION**  
**(Proceeds of Tax Fraud Scheme)**

The SPECIAL NOVEMBER 2020 GRAND JURY further alleges:

1. The allegations in Counts One through Seven are incorporated here for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

2. As a result of her violations of Title 18, United States Code, Section 1343, as alleged in Counts One through Seven,

KATRINA PIERCE,

defendant herein, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all right, title, and interest she may have in any property, real and personal, which constitutes and was derived from proceeds traceable to such violations.

3. If any of the forfeitable property described above, as a result of any act or omission by PIERCE:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States shall be entitled to forfeiture of substitute property under the provisions of Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c);

All pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

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FOREPERSON

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Signed by Jason Yonan on behalf of the  
UNITED STATES ATTORNEY